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**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

In re:  ROCHESTER DRUG CO-OPERATIVE, INC.  Debtor.	Chapter 11  Case No. 20-20230 (PRW)
Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,  Plaintiff,  v.  BEIERSDORF, INC.,  Defendant.	Adv. Proc. No. 22-02009-PRW

**THIRD STIPULATION EXTENDING TIME TO ANSWER COMPLAINT**

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant Beiersdorf, Inc. (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;  
and

WHEREAS, on March 3, 2022, the Parties entered into a stipulation (the “First Stipulation”) by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered March 4, 2022.

WHEREAS, on April 11, 2022, the Parties entered into a stipulation (the “Second Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including June 15, 2022. The Second Stipulation was approved by order entered April 12, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including July 29, 2022.

*[Remainder of Page Intentionally Left Blank]*

2. All other terms set forth in the First Stipulation and Second Stipulation remain in full force and effect.

Dated: June 29, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

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*Counsel to Plaintiff RDC Liquidating Trust*

Dated: June 28, 2022

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*Counsel to Defendant Beiersdorf, Inc.*

SO ORDERED:

DATED: \_\_\_\_\_, 2022  
Rochester, New York

\_\_\_\_\_  
HON. PAUL R. WARREN  
United States Bankruptcy Judge